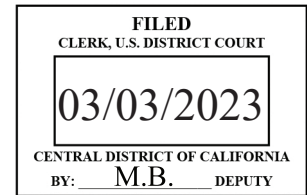


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

RAEONNAH THOMAS and NORRELL
ANDERSON,

Defendants

Case No. 2:23-mj-01022 -DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the dates of December 2022 and February 13, 2023 in the county of Los Angeles in the Central District of California, the defendants violated:

Code Section
18 U.S.C. § 2423(e)

Offense Description
Conspiring to Transport a Minor

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ David Rocha

Complainant's signature

David Rocha, Special Agent, DHS-HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: March 3, 2023

City and state: Santa Ana, California

Judge's signature

Honorable John D. Early, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, David Rocha, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security, United States Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI") and have been so employed since January 2004. In 2004, I graduated from the Criminal Investigator Training Program and the ICE Special Agent Training Program. While employed by HSI, I have received classroom and on-the-job training on federal criminal, customs, immigration, and nationality laws.

2. I am currently assigned to the Office of the Special Agent in Charge, Border Security Group ("BSG"), which is an enforcement group tasked with investigating human smuggling, trafficking, money laundering, and bulk cash smuggling in Los Angeles and Orange Counties.

3. Both before and while I have been assigned to this group, I have conducted and participated in numerous investigations involving human trafficking and smuggling. These investigations include schemes involving the interstate transportation of individuals for commercial sex, as well as the exploitation of victims for commercial sex. During these investigations, I have interviewed suspects and witnesses, reviewed and collected evidence, conducted surveillance, and obtained and executed arrest and search warrants. Based on my training and experience, I am also familiar with the ways in

which individuals recruit, exploit, and profit from victims of trafficking.

II. PURPOSE OF AFFIDAVIT

4. This affidavit is made in support of a criminal complaint against, and arrest warrants for, RAEONNAH THOMAS ("THOMAS") and NORRELL ANDERSON ("ANDERSON") for a violation of 18 U.S.C. § 2423(e) (Conspiring to Transport a Minor).

5. This affidavit is also made in support of a search warrant for a black iPhone bearing serial number GFQKC2VWRM and bearing IMEI number 352129381737528 in a clear case with a turtle popper placed on the rear ("SUBJECT DEVICE 1"), which is currently maintained in the custody of the Anaheim Police Department in Anaheim, California; and a blue iPhone in a black case, which is currently maintained in the custody of the Anaheim Police Department in Anaheim, California ("SUBJECT DEVICE 2") (collectively, the "SUBJECT DEVICES"), as described more fully in Attachment A. The requested search warrant seeks authorization to seize evidence, fruits, or instrumentalities for violations of 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 1591 (Sex Trafficking of Children or by Force, Fraud, or Coercion), 18 U.S.C. § 2421 (Transportation), 18 U.S.C. § 2421A (Promotion or Facilitation of Prostitution and Reckless Disregard of Sex Trafficking), 18 U.S.C. § 2422 (Coercion and Enticement), and 18 U.S.C. § 2423 (Transportation of a Minor), 18 U.S.C. § 2251 (Production of Child Pornography), 18 U.S.C. § 2252A (Possession and/or Distribution of Child Pornography) (the "SUBJECT

OFFENSES"), as described more fully in Attachment B.

Attachments A and B are incorporated herein by reference.

6. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrants and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

III. SUMMARY OF PROBABLE CAUSE

7. In early February 2023, an undercover Irvine Police Department detective ("UC-1") used an Instagram account (the "UC Account") portraying a fictitious female user ("Jessica" or "Jess") to contact an Instagram account associated with a known minor who UC-1 suspected was engaging in sex work ("Minor Victim 1"). In messages to Minor Victim 1, UC-1 indicated that "Jessica" was also interested in prostitution. Someone using the account associated with Minor Victim 1, who identified themselves as Minor Victim 1's "wifey,"¹ instructed UC-1 to contact a telephone number that was later determined to be used by THOMAS. UC-1 and another undercover investigator ("UC-2") continued to pose as "Jessica" and corresponded with THOMAS via

¹ Based on my training and experience, I know that the term "wifey" is used in the pimping and prostitution subculture to refer to prostitutes working under the same pimp.

text message and phone calls to discuss sex work. THOMAS attempted to recruit "Jessica" to work as a sex worker for THOMAS's "daddy," or pimp, who was later identified as ANDERSON.

8. On or about February 13, 2023, law enforcement determined that THOMAS, ANDERSON, and Minor Victim 1 were staying at the Four Points by Sheraton Hotel located at 9750 Airport Boulevard, Los Angeles, CA 90045 (the "Four Points Hotel"), which is near Los Angeles International Airport ("LAX"). That evening, law enforcement went to the hotel, found THOMAS, and detained her. A short time later, law enforcement also found and detained ANDERSON at the hotel. At the time law enforcement apprehended him, ANDERSON was accompanied by Minor Victim 1 and a second minor ("Minor Victim 2").

9. UC-1 interviewed THOMAS, ANDERSON, Minor Victim 1, and Minor Victim 2. During her interview, THOMAS admitted that she was a sex worker and that she and ANDERSON had picked up Minor Victim 2 in Las Vegas, Nevada the previous day and driven her to Los Angeles, California. However, THOMAS denied that ANDERSON was her pimp. During his interview, ANDERSON stated that he was in Los Angeles to buy and sell cars and that THOMAS was his girlfriend. ANDERSON denied knowing that THOMAS was a sex worker. During her interview, Minor Victim 1 denied that ANDERSON was her pimp but admitted to paying him money for protection. Minor Victim 1 also stated that THOMAS had taken her photographs for sex advertisements, and ANDERSON told her where to post the photographs. During her interview, Minor Victim 2 stated that she met ANDERSON via Instagram

approximately two months prior, and that ANDERSON introduced her to THOMAS. According to Minor Victim 2, ANDERSON, THOMAS, and Minor Victim 2 arranged for ANDERSON and THOMAS to meet and pick up Minor Victim 2 in Las Vegas and drive her to Los Angeles. When they arrived in Los Angeles, ANDERSON and THOMAS attempted to convince Minor Victim 2 to engage in sex work, including by posting sex advertisements for Minor Victim 2 online and teaching her how to engage in sex work. During the interview, Minor Victim 2 stated that she told THOMAS that she did not want to do sex work.

10. A search of THOMAS's cell phone pursuant to a state search warrant revealed text messages between THOMAS and ANDERSON that appeared to reference sex work. THOMAS and ANDERSON also exchanged text messages referencing Minor Victim 1 and Minor Victim 2. Those text messages included a message from ANDERSON to THOMAS instructing THOMAS to contact Minor Victim 2 approximately one week prior to their arrest. THOMAS and ANDERSON also exchanged text messages on or about February 13, 2023, regarding THOMAS's failed attempts at teaching Minor Victim 2 how to engage in sex work. In addition, on or about February 7, 2023, THOMAS and ANDERSON discussed Minor Victim 1's payment of a fee for ANDERSON to be her pimp.

IV. STATEMENT OF PROBABLE CAUSE

A. February 5 to February 8, 2023: THOMAS Attempts to Recruit UC-1 into Prostitution

11. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. In or around July 2022, Minor Victim 1 called 911 and reported that she was a minor out on the "track,"² on Beach Boulevard, an area in Anaheim that is known to be associated with sex work, engaging in prostitution, and wanted someone from law enforcement to pick her up. A patrol officer picked her up and took her to a children's home--a long and short-term residential facility that provides services for minors who have experienced abuse, neglect, violence, and/or abandonment. That same month, at the group home, UC-1 and UC-1's partner conducted a forensic interview of Minor Victim 1, during which, Minor Victim 1 admitted that she was fifteen years old and further, that she had been engaging in sex work. Around that time, UC-1 learned Minor Victim 1's Instagram handle and following the forensic interview, sporadically searched for her Instagram account so that s/he would know if Minor Victim 1 returned to prostitution.

b. On or about February 5, 2023, while searching for Minor Victim 1 on Instagram, UC-1 came across a public³ Instagram account bearing the account handle ""thaarealistt_.d" and the profile display name "Diamond." Upon reviewing the Instagram page, UC-1 concluded that the likely owner of this account was the same minor that patrol had picked up on Beach Boulevard in

² Based on my training and experience, I know that the term "track" is used in the pimping and prostitution subculture to refer to an area or locale known for prostitution activity. Other terms used synonymously with "track" are "stroll" and "blade."

³ Based on my training and experience, I know that if an account is set to "public," that means that anyone can see the profile and posts simply by visiting that page.

or around July 2022, and that s/he had later interviewed. UC-1 believed that the account belonged to Minor Victim 1 given his/her prior searches for Minor Victim 1's account and because there were several photographs of someone who appeared to be Minor Victim 1 on the Instagram page.

c. UC-1 continued to monitor Minor Victim 1's Instagram account and followed the account using an undercover Instagram account that purported to belong to a female user named "Jessica" or "Jess" (the UC Account).

d. On or about February 5, 2023, UC-1 was looking at Minor Victim 1's account and noticed that someone posted a "story"⁴ depicting a large sum of U.S. currency. Based on UC-1's training and experience, s/he knew that individuals engaging in sex work are often paid in cash and further, that those individuals often brag about their income by showing off large sums of money on their social media accounts. Based on his/her training, experience, and prior interactions with Minor Victim 1, UC-1 then concluded that Minor Victim 1 was still involved in sex work and that she (or someone using her account) had posted proceeds from sex work on her story.

e. After watching the "story," UC-1 sent a direct message to Minor Victim 1's account using the UC Account and asked where Minor Victim 1 was. Minor Victim 1 responded that she was in Oakland, California. UC-1 then messaged that

⁴ Based on my training and experience, I know that a "story" is a photograph or video posted to an Instagram account that is designed to disappear after 24 hours.

"Jessica" was "lookin to choose up."⁵ THOMAS,⁶ using Minor Victim 1's account, replied, "Call me when u can this is her wifey⁷ (415)608-4082." Someone using Minor Victim 1's account also sent messages stating: "we do it on the net"⁸ and "U don't even have to go on the blade."⁹ (Based on UC-1's interview with Minor Victim 1, on or about February 13, 2023, during which she stated that THOMAS was using her phone at this time, I believe that THOMAS also sent the two latter messages.)

f. On or about February 6, 2023, UC-1 texted THOMAS at the 4082 Number. On that date, UC-1 and THOMAS exchanged the following messages:

UC-1: so wut is you folks¹⁰ like wann kno bfre I
 choose up feel me

⁵ Based on my training, experience, and discussions with other law enforcement personnel, I know that the phrase "choose up" is used in the pimping and prostitution subculture to refer to working as a prostitute under the control of a pimp.

⁶ Based on cellphone records and law enforcement database searches, I know that (415)608-4082 (the "4082 Number") is associated with THOMAS. Given that the message stated, "call me," I believe that THOMAS, using Minor Victim 1's account, was instructing "Jessica" to call her. Unless stated otherwise, all phone correspondence with THOMAS occurred through this phone number.

⁷ Based on my training and experience, I know that the term "wifey" is used in the pimping and prostitution subculture to refer to prostitutes working under the same pimp.

⁸ Based on my training and experience, I know that "net" is a term used in the pimping and pandering subculture to refer to the practice of posting sex advertisements online.

⁹ Based on my training and experience, I know that "blade" is a term used in the pimping and pandering subculture to refer to areas or locales where sex workers and sex purchasers loiter with the intent to solicit sex acts for money.

¹⁰ Based on my training and experience, I know that "daddy" and "folks" are terms used in the pimping and pandering subculture to refer to the pimp for whom a prostitute works.

THOMAS: He is hella sweet

THOMAS: He doesn't make u go outside unless it's dry
on the net or if u being bad he won't hit u
he puts you outside

THOMAS: We travel a lot

THOMAS: We our a family

g. Shortly after exchanging the above text messages, an Orange County Human Trafficking Task Force ("OC Task Force") officer, who was also working in an undercover capacity (UC-2), called THOMAS on the 4082 Number, using the same phone number that UC-1 had used to communicate with THOMAS via text message. During that phone call, THOMAS told UC-2 that she was the "bottom."¹¹ THOMAS told UC-2 that she was responsible for "knocking."¹² THOMAS also told UC-2 that she had a "daddy," and that Minor Victim 1, whom THOMAS referred to as "Diamond," the same name that was on Minor Victim 1's Instagram account, was working for THOMAS's "daddy." THOMAS told UC-2 that she and her "daddy" believed Minor Victim 1 was a minor.

h. Also, on or about February 6, 2023, UC-1 searched for online sex advertisements associated with the 4082 Number. Through that search, UC-1 found online sex advertisements that had the 4082 Number listed as the contact number. The sex advertisements were posted for the Oakland area and contained

¹¹ Based on my training and experience, I know that "bottom" is a term used in the pimping and pandering subculture to refer to the most trusted sex worker working for a pimp.

¹² Based on my training and experience, I know that "knocking" is a term used in the pimping and pandering subculture to refer to the process of recruiting sex workers to work for a pimp.

pictures of someone who appeared to be Minor Victim 1. UC-1 also found online sex advertisements of a second person, who appeared to be THOMAS,¹³ which also listed the 4082 Number as the contact number.

i. In addition to the online sex advertisements associated with the 4082 Number, UC-1 also found additional sex advertisements containing pictures of someone who appeared to be Minor Victim 1 that listed a different contact number--(323) 572-1815 (the "1815 Number").

j. On or about February 7, 2023, THOMAS and UC-1 exchanged the following messages:

THOMAS: Did I tell you if u come with us there a fee?¹⁴

UC-1: figurd daddy had a fee wut is it n can I work it off

THOMAS: It's 1500-3000

THOMAS: And yes u can if u don't have it all

THOMAS: How old r u

UC-1: coo coo im 18 will be 19 in july.

Based on my training and experience, I believe that in the above text messages, THOMAS attempted to recruit UC-1 to work as a prostitute and informed him/her that instead of paying money, s/he (UC-1) could do sex work to pay for the "choose up fee,"

¹³ Law enforcement later determined that this was likely a photograph of THOMAS after running her name through law enforcement databases and locating her California driver's license photograph.

¹⁴ Based on my training and experience, I know that "fee" and "choose up fee" are terms used in the pimping and pandering subculture to refer to an amount of money that a sex worker is expected to pay to begin working for a pimp.

the fee sex workers are required to pay before they can begin working for a pimp.

k. Later that day, THOMAS sent the following text message to UC-1: "Follow my [n-word] on ig¹⁵ @paynohoe.3." Using the UC Account, UC-1 followed an Instagram account with the handle "paynohoe.3," which had pictures as well as video "stories" of a Black male, who law enforcement later determined was ANDERSON for reasons stated in subparagraph A(1).

l. On or about February 8, 2023, UC-1 searched for new online sex advertisements for Minor Victim 1 and THOMAS. Through that search, UC-1 found an online sex advertisement with photographs of a person who appeared to be THOMAS. The contact phone number for the advertisement was a different phone number from the other two used for previous advertisements--(408) 606-1796 (the "1769 Number").

m. Using law enforcement databases, UC-1 determined that the 1815 Number was associated with the name "Anderson Norrel." UC-1 searched law enforcement databases for "Anderson Norrel" and found an individual named "Norrell Anderson." UC-1 obtained a California Driver's License photograph for "Norell Anderson," and determined that he appeared to be the same person depicted in photographs and videos on the "paynohoe.3" Instagram account. Among other reasons, because THOMAS identified the user of that account as "my [n-word]," and the 1769 Number, a phone number associated with ANDERSON, was linked to one of

¹⁵ Based on my training and experience, I know that "ig" is an abbreviation for "Instagram."

THOMAS's sex advertisements, UC-1 believed that ANDERSON was THOMAS's pimp.

B. February 12, 2023 to February 13, 2023: Law Enforcement Arrests THOMAS and ANDERSON While They Are at a Hotel with Minor Victim 1 and a Second Minor ("Minor Victim 2")

12. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. On or about February 12, 2023, UC-1 texted THOMAS and asked whether she would be coming to Orange County, California. THOMAS responded that she was in Los Angeles.

b. That same day, UC-1 searched for new online sex advertisements for Minor Victim 1 and THOMAS. Through that search, UC-1 found multiple online sex advertisements posted in the Los Angeles area with pictures of people who appeared to be THOMAS and Minor Victim 1. The 4082 Number and the 1815 Number were the numbers associated with the sex advertisements.

c. On or about February 13, 2023, UC-1 obtained a state cell-site location warrant for the three numbers associated with THOMAS and Minor Victim 1's online sex advertisement postings--the 4082 Number, the 1815 Number, and the 1796 Number. At approximately 7:00 p.m. that same day, OC Task Force investigators obtained GPS location data indicating that the person using the 1815 Number was around 96th Street and Airport Boulevard in Los Angeles, California, which is near LAX.

d. Then, law enforcement contacted hotels in the area around LAX attempting to locate either THOMAS, ANDERSON,

and/or Minor Victim 1. Law enforcement determined that THOMAS had rented a room at the Four Points Hotel.

e. At approximately 9:06 p.m., investigators saw THOMAS in the lobby of the Four Points Hotel and detained her. At the time she was detained, THOMAS was carrying SUBJECT DEVICE 1, which law enforcement seized.

f. At approximately 9:38 p.m., UC-1 saw ANDERSON enter the lobby of the Four Points Hotel. ANDERSON was accompanied by Minor Victims 1 and 2. Law enforcement detained ANDERSON and the minor victims. ANDERSON was carrying SUBJECT DEVICE 2, which law enforcement seized.

C. February 13, 2023: Law Enforcement Conducts an Unrecorded, Mirandized Interview of THOMAS

13. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. At approximately 9:59 p.m. on or about February 13, 2023, UC-1 interviewed THOMAS in an office at the Four Points Hotel. This interview was recorded. Prior to beginning the interview, UC-1 read THOMAS her Miranda rights, and THOMAS verbally acknowledged that she understood those rights. During the interview, THOMAS admitted to being involved in sex work but denied that ANDERSON was her pimp. THOMAS stated that ANDERSON was her boyfriend. THOMAS stated that Minor Victim 2 was her friend, and that she and ANDERSON had picked up Minor Victim 2 from Las Vegas the previous day and brought her to Los Angeles. Based on historical cell-site location data obtained through the state search warrant, the phone associated with the 4082 Number

(a number associated with THOMAS) traveled from the Las Vegas area to the Los Angeles area on or about February 12, 2023.

b. UC-1 told THOMAS that OC Task Force investigators were attempting to locate an individual named "Jessica," which was the fictitious UC identity used by the UC's to communicate with Minor Victim 1 and THOMAS. THOMAS agreed to unlock SUBJECT DEVICE 1, which she confirmed was assigned the 4082 Number, so that UC-1 could review it. She then showed UC-1 the text messages she had exchanged with "Jessica."¹⁶ While looking through SUBJECT DEVICE 1, UC-1 saw a contact saved as "Daddy 2nd Number" had sent several text messages to THOMAS. UC-1 asked THOMAS who that contact was, and THOMAS stated that it was her boyfriend, which UC-1 took to mean ANDERSON. As previously stated, "daddy" is a term sex workers will often use to refer to their pimps. The fact that THOMAS saved ANDERSON's number as "Daddy 2nd Number" in her phone further supports my belief that ANDERSON is THOMAS's pimp.

D. February 13, 2023: Law Enforcement Conducts an Unrecorded, Mirandized Interview of ANDERSON

14. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. At approximately 10:58 p.m. on or about February 23, 2023, UC-1 interviewed ANDERSON, who was detained in another office at the Four Points Hotel. This interview was recorded. UC-1 read ANDERSON his Miranda rights, and ANDERSON verbally acknowledged that he understood those rights. ANDERSON stated

¹⁶ UC-1 did not inform THOMAS that s/he was one of the people who had been communicating with THOMAS as "Jessica."

that he was in Los Angeles to buy and sell cars. ANDERSON stated that THOMAS was his girlfriend and denied knowing that THOMAS was a sex worker. ANDERSON stated that the Instagram account with the handle "paynohoe.3" was an old Instagram account of his that he no longer used, and he denied posting any of the recent photographs or videos of himself on the account. UC-1 asked ANDERSON if he would provide consent for him/her to search SUBJECT DEVICE 2, and ANDERSON declined to provide consent.

E. February 13, 2023: Law Enforcement Conducts a Forensic Interview of Minor Victim 1

15. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. At approximately 11:39 p.m. on or about February 13, 2023, UC-1 interviewed Minor Victim 1, who was seated in a conference room area at the Four Points Hotel. UC-1 asked Minor Victim 1 about the Instagram messages that someone using her account had exchanged with "Jessica" (the fictitious person affiliated with the UC Account). Minor Victim 1 stated that she had given her phone to THOMAS, and that THOMAS had written those messages. Minor Victim 1 initially denied being involved in prostitution but ultimately admitted that she was engaged in sex work. Minor Victim 1 stated that she had met THOMAS approximately one month prior in San Bernardino, California, and had traveled to the Oakland area with THOMAS and ANDERSON within the last week. Minor Victim 1 stated that THOMAS took the photographs in her online sex advertisements, and that ANDERSON

told Minor Victim 1 which websites to post those photographs on. Minor Victim 1 denied that ANDERSON was her pimp; however, she admitted that she had paid money to ANDERSON for protection while she engaged in sex work. Based on my training and experience, I know that pimps will sometimes provide "protection" for sex workers. "Protection" consists of warding off unwanted "knocking" from other pimps, and rape, assaults, and robberies from potential sex purchasers. Among other reasons, because Minor Victim 1 stated that she paid ANDERSON for protection while she engaged in sex work, I believe that ANDERSON is her pimp.

F. February 14, 2023: Law Enforcement Conducts a Forensic Interview of Minor Victim 2

16. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. At approximately 12:49 a.m. on or about February 14, 2023, UC-1 interviewed Minor Victim 2, who was seated in a separate conference room area at the Four Points Hotel. Minor Victim 2 stated that she had arrived in Los Angeles from Las Vegas the previous night with THOMAS and ANDERSON by car. ANDERSON and THOMAS picked Minor Victim 2 up in Las Vegas and drove her to Los Angeles. Minor Victim 2 stated that she was seventeen years old, but she had told THOMAS and ANDERSON that she was eighteen years old.¹⁷ Minor Victim 2 stated that she

¹⁷ It is not a defense to the crime of transporting a minor for purposes of prostitution that the defendant was ignorant of the child's age. United States v. Taylor, 239 F.3d 994, 997 (9th Cir. 2001). "If someone knowingly transports a person for
(footnote cont'd on next page)

first met ANDERSON through Instagram approximately two months prior. After exchanging messages with ANDERSON, ANDERSON introduced Minor Victim 2 to THOMAS, who befriended her. Minor Victim 2 said that she and THOMAS discussed Minor Victim 2 traveling with THOMAS and ANDERSON to California and coordinated to meet up at Minor Victim 2's workplace after she got off. Minor Victim 2 stated that they did not talk much during the car ride from Las Vegas to Los Angeles or when they arrived in Los Angeles, but Minor Victim 2 recalled a brief conversation with THOMAS about her pictures being posted on the "net."¹⁸

b. Minor Victim 2 said that she mostly interacted with THOMAS. Minor Victim 2 said that when she arrived in Los Angeles, THOMAS brought up the possibility of her doing sex work in exchange for money. Minor Victim 2 told THOMAS that she was not interested in doing sex work in exchange for money. Minor Victim 2 said that she believed THOMAS must have posted sex advertisements for her online using pictures from his/her Instagram account because she had not taken any photographs for THOMAS. Minor Victim 2 stated that THOMAS handled most of the text communications with potential sex purchasers,¹⁹ but that Minor Victim 2 had to do any video chats because the pictures in

the purposes of prostitution or another sex offense, the transporter assumes the risk that the victim is a minor, regardless of what the victim says or how the victim appears." Id.

¹⁸ As previously stated, "net" is a term used in the pimping and pandering subculture to refer to the practice of posting sex advertisements online.

¹⁹ Based on my training and experience, I know that "john" and "trick" are terms used in the pimping and pandering subculture to refer to a sex purchaser.

the sex advertisements were pictures of her. Minor Victim 2 said that she did not ultimately have any "dates"²⁰ with sex purchasers.

c. Minor Victim 2 gave UC-1 consent to search her phone. When UC-1 began reviewing the phone, s/he noticed several text messages that appeared to be from potential sex purchasers. UC-1 also saw text messages between Minor Victim 2 and THOMAS in which THOMAS referenced "daddy" (which UC-1 took to be a reference to ANDERSON) and requested the passcode to Minor Victim 2's phone and verification codes sent to her phone. UC-1 then asked Minor Victim 2 why THOMAS and ANDERSON would be asking for codes, and Minor Victim 2 stated that she believed it was because they were setting up sex advertisements.

G. February 14, 2023: Law Enforcement Arrests ANDERSON and THOMAS

17. Based on my conversations with UC-1 and my review of his/her notes and reports, I know the following:

a. After completing Minor Victim 2's interview, state law enforcement arrested ANDERSON and THOMAS for pandering and attempted pimping, in violation of Cal. Penal Code 266i(a) and Cal. Penal Code 266h(a). Minor Victim 1 was released to the custody of San Bernardino County Social Services. Minor Victim 2 was released to the custody of her grandparent.

²⁰ As previously stated, "dates" is a term used in the pimping and pandering subculture to refer to the performance of sex acts in exchange for money.

H. February 15, 2023: Law Enforcement Searches SUBJECT DEVICE 1, Which Appeared to Contain Text Messages Between ANDERSON and THOMAS Discussing Pimping Minor Victim 1

18. Based on my conversations with UC-1, my review of his/her notes and reports, and my own review of text messages between ANDERSON and THOMAS I know the following:

a. On or about February 15, 2023, UC-1 obtained a state search warrant to search the SUBJECT DEVICES, which are currently in the custody of the Anaheim Police Department in Anaheim, California.

b. When searching SUBJECT DEVICE 1, UC-1 found messages between THOMAS and the contact named "Daddy's 2nd Phone," which THOMAS had identified as her "boyfriend," and UC-1 took to mean ANDERSON, that appeared to reference Minor Victim 1 and Minor Victim 2. These messages included the following:

i. On or about February 6, 2023, ANDERSON sent a text message to THOMAS giving THOMAS a phone number with the Las Vegas area code (725). ANDERSON followed that message with another text message stating, "Snow call her."²¹ (Based, among other things, on Minor Victim 2's statements during her interview that she met ANDERSON first and then he introduced her to THOMAS, I believe that the contact named "Daddy's 2nd Phone" is ANDERSON.)

²¹ The phone number ANDERSON sent to THOMAS was the same number that Minor Victim 2 provided to law enforcement as her contact number on or about February 14, 2023. UC-1 also found sex advertisements for Minor Victim 2 using the name "Snow." Based on this information, I believe that ANDERSON is telling THOMAS to call Minor Victim 2 in these messages.

ii. On or about February 7, 2023, THOMAS and ANDERSON exchanged the following text messages about "Diamond" (Minor Victim 1):

THOMAS: Daddy²² how come we didn't make diamond pay

ANDERSON: We did

ANDERSON: We made her bust a date²³

ANDERSON: Since she didn't have no money on her

Based on my training, experience, and knowledge of this case, I believe that THOMAS was asking ANDERSON why Minor Victim 1, who has previously used the name "Diamond" on her Instagram profile name and in sex advertisements, did not pay a "choose up fee" to ANDERSON, and ANDERSON was telling THOMAS that because Minor Victim 1 did not have any money, he made her engage in sex work to cover her fee.

iii. On or about February 12, 2023, ANDERSON and THOMAS exchanged the following text messages:

ANDERSON: What's her code ?

ANDERSON: To her phone

THOMAS: It's for the email I need to send

THOMAS: [blank message]

ANDERSON: What's her phone thing

ANDERSON: ??

THOMAS: Dude, this fucking bitch on the phone don't fucking listen for shit. I'm telling your hold on please she waits two seconds and

²² As previously stated, "daddy" is a term sex workers use in the pimping and pandering subculture to refer to their pimp.

²³ As previously stated, "bust a date" is a term used in the pimping and pandering subculture to refer to the performance of sex acts in exchange for money.

then start saying the same shit that I just told her to hold onto because I was trying to get the screenshot from you and she starts saying this code and I'm like oh my God.

ANDERSON: ª

ANDERSON: What's her phone password Bruh

ANDERSON: For the thing expire

ANDERSON: Ask her Bruh

Based on my training and experience, I know that many sex work websites have an age restriction and do not allow anyone to post sex advertisements who is under the age of 18. Typically, when making an account, one needs to provide a picture with their identification in hand, as proof of their age, and a phone number. Then, the website will send an automated verification code to the number provided. Based on my training and experience and Minor Victim 2's statement to UC-1, I also believe that in the text messages above, ANDERSON and THOMAS were attempting to obtain verification codes to set up sex advertisements for Minor Victim 2.

iv. On or about February 13, 2023, ANDERSON and THOMAS exchanged the following text messages:

ANDERSON: Bruh it's 4 am

ANDERSON: And your just now yet a go outside

ANDERSON: This that shit I be tellin u about bitch u worried about the wrong shit u supposed to be getting down Bruh

ANDERSON: Tired of repeating myself u know damn well it's not poppin at no 4 am weirdo stop doing

weird shut and listen before I drop u²⁴

ANDERSON: And if u over there talking shit I will find out trust me ain't none of that other shit going on

THOMAS: [blank message]

THOMAS: And then we had still had to go to CVS because it was right down the street and she needed lashes and on lash glue so we went there and she bought them but we've been texting all these people back and FaceTime verifying but these people having oh lowballing her or they just hang up

THOMAS: I've been helping her all night explaining to her what like to do and what to do and she was freaking out so I'm not gonna put her on the blade²⁵ right away because it's her first time I needed to explain everything to her and I hope you understand this Daddy²⁶

ANDERSON: U ain't made no money ??

THOMAS: Not yet

THOMAS: One person has stopped

THOMAS: We've been at this street for a lil so we going to walk by someone else then we e is hella cars out rn tho

...

ANDERSON: U ain't had no one wanting a Incall²⁷ ?

²⁴ Based on my training, experience, and the context of these messages, I believe that by threatening to "drop" her, ANDERSON was telling THOMAS that he would cut her loose and disallow her from working for him anymore because she was not doing what he told her to.

²⁵ As previously stated, "blade" is a term used in the pimping and pandering subculture to refer to areas where sex workers and sex purchasers loiter with the intent to solicit sex acts for money.

²⁶ As previously stated, "daddy" is a term sex workers often use to refer to their pimp.

²⁷ Based on my training, experience, and the context of these messages, I know that the term "incall" is used in the
(footnote cont'd on next page)

THOMAS: Yeah he said I did but then we FaceTime verified and they literally like only had 120 or 100 and they wanted it for like an hour and then they were only trying to give us weed

Based on my training, experience, and Minor Victim 2's statement to UC-1, I believe that in the above text messages, ANDERSON and THOMAS were discussing THOMAS's attempts to teach Minor Victim 2 to engage in sex work, and ANDERSON was expressing his anger with THOMAS because Minor Victim 2 had not yet made any money that evening.

v. On or about February 13, 2023, during the evening, THOMAS sent the following text message to ANDERSON:

THOMAS: Tell that bitch she better remember what you said when she was with us and we was at the other room in LA and u was like no more attitudes no more weird faces no more nun and she better remember all that. But the most important thing she better have some respect for all of us. Like for real for real hot as she says it on GOD she better act like a new bitch not the same one that I know it better be a different diamond or I'm Finna call her [Minor Victim 1's Name]²⁸

Based on my training, experience, and knowledge of this case, I believe that in the above text message, THOMAS was complaining to ANDERSON about Minor Victim 1's attitude and was suggesting that ANDERSON should no longer have Minor Victim 1 work for him if she did not begin to behave better.

pimping and pandering subculture to refer to a sex purchaser who will travel to the location of the sex worker for them to engage in sexual activity.

²⁸ The text message included Minor Victim 1's legal first name, which has been redacted for purposes of this complaint.

c. When searching Minor Victim 1's cellphone, UC-1 found text message conversations between suspected sex purchasers and Minor Victim 1 regarding them tendering payment with CashApp. In addition, UC-1 saw that Minor Victim 1 had a history of CashApp payments to ANDERSON. When searching SUBJECT DEVICE 1, UC-1 also found text messages between THOMAS and ANDERSON regarding sex purchasers paying for services via CashApp and Venmo.

Based on my training and experience, I know that in addition to tendering payment in cash, sex purchasers will also pay sex workers using money transfer applications, including Paypal, CashApp, and Venmo, and then the sex workers will transfer the money to their pimps using the same applications.

V. TRAINING AND EXPERIENCE ON DIGITAL DEVICES

19. As used herein, the term "digital device" includes the SUBJECT DEVICES.

20. Based on my training, experience, and information from those involved in the forensic examination of digital devices, I know that the following electronic evidence, inter alia, is often retrievable from digital devices:

a. Forensic methods may uncover electronic files or remnants of such files months or even years after the files have been downloaded, deleted, or viewed via the Internet. Normally, when a person deletes a file on a computer, the data contained in the file does not disappear; rather, the data remain on the hard drive until overwritten by new data, which may only occur after a long period of time. Similarly, files viewed on the

Internet are often automatically downloaded into a temporary directory or cache that are only overwritten as they are replaced with more recently downloaded or viewed content and may also be recoverable months or years later.

b. Digital devices often contain electronic evidence related to a crime, the device's user, or the existence of evidence in other locations, such as, how the device has been used, what it has been used for, who has used it, and who has been responsible for creating or maintaining records, documents, programs, applications, and materials on the device. That evidence is often stored in logs and other artifacts that are not kept in places where the user stores files, and in places where the user may be unaware of them. For example, recoverable data can include evidence of deleted or edited files; recently used tasks and processes; online nicknames and passwords in the form of configuration data stored by browser, e-mail, and chat programs; attachment of other devices; times the device was in use; and file creation dates and sequence.

c. The absence of data on a digital device may be evidence of how the device was used, what it was used for, and who used it. For example, showing the absence of certain software on a device may be necessary to rebut a claim that the device was being controlled remotely by such software.

d. Digital device users can also attempt to conceal data by using encryption, steganography, or by using misleading filenames and extensions. Digital devices may also contain "booby traps" that destroy or alter data if certain procedures

are not scrupulously followed. Law enforcement continuously develops and acquires new methods of decryption, even for devices or data that cannot currently be decrypted.

21. Based on my training, experience, and information from those involved in the forensic examination of digital devices, I know that it can take a substantial period of time to search a digital device for many reasons, including the following:

a. Digital data are particularly vulnerable to inadvertent or intentional modification or destruction. Thus, often a controlled environment with specially trained personnel may be necessary to maintain the integrity of and to conduct a complete and accurate analysis of data on digital devices, which may take substantial time, particularly as to the categories of electronic evidence referenced above.

b. Digital devices capable of storing multiple gigabytes are now commonplace. As an example of the amount of data this equates to, one gigabyte can store close to 19,000 average file size (300kb) Word documents, or 614 photos with an average size of 1.5MB.

22. The search warrant requests authorization to use the biometric unlock features of a device, based on the following, which I know from my training, experience, and review of publicly available materials:

a. Users may enable a biometric unlock function on some digital devices. To use this function, a user generally displays a physical feature, such as a fingerprint, face, or eye, and the device will automatically unlock if that physical

feature matches one the user has stored on the device. To unlock a device enabled with a fingerprint unlock function, a user places one or more of the user's fingers on a device's fingerprint scanner for approximately one second. To unlock a device enabled with a facial, retina, or iris recognition function, the user holds the device in front of the user's face with the user's eyes open for approximately one second.

b. In some circumstances, a biometric unlock function will not unlock a device even if enabled, such as when a device has been restarted or inactive, has not been unlocked for a certain period of time (often 48 hours or less), or after a certain number of unsuccessful unlock attempts. Thus, the opportunity to use a biometric unlock function even on an enabled device may exist for only a short time. I do not know the passcodes of the devices likely to be found in the search.

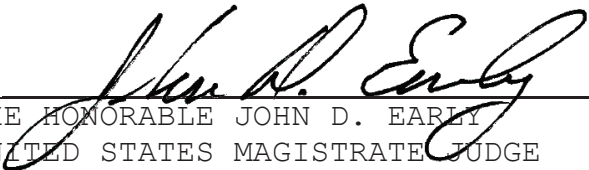
c. The person who is in possession of a device or has the device among his or her belongings is likely a user of the device. Thus, the warrant I am applying for would permit law enforcement personnel to, with respect to any device that appears to have a biometric sensor and falls within the scope of the warrant: (1) depress ANDERSON and THOMAS's thumb and/or fingers on the device(s); and (2) hold the device(s) in front of ANDERSON and THOMAS's face with his or her eyes open to activate the facial-, iris-, and/or retina-recognition feature.

23. Other than what has been described herein, to my knowledge, the United States has not attempted to obtain this data by other means.

VI. CONCLUSION

24. For all the reasons described above, there is probable cause to believe that ANDERSON and THOMAS violated 18 U.S.C. § 2423(e) (Conspiracy to Transport a Minor in Interstate Commerce for Prostitution). There is also probable cause that the items to be seized described in Attachment B will be found in a search of the SUBJECT DEVICES described in Attachment A.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 3rd day of
March, 2023.



THE HONORABLE JOHN D. EARLY
UNITED STATES MAGISTRATE JUDGE